

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHRISTOPHER GODSON, on behalf of)
himself and all others similarly situated,)
) No. 17-mc-434
Plaintiff,)
)
v.)
)
ELTMAN, ELTMAN & COOPER, P.C.,)
and LVNV FUNDING, LLC,)
)
Defendants.)

CHRISTOPHER GODSON, on behalf of)
himself and all others similarly situated,)
)
Movant,)
)
v.)
)
PKF O'CONNOR DAVIES, LLP,)
)
Respondent.

**CHRISTOPHER GODSON'S MOTION TO HOLD PKF O'CONNOR DAVIES, LLP
IN CONTEMPT AND TO REQUIRE ITS COMPLIANCE WITH SUBPOENA**

Upon the accompanying Declaration of Brian L. Bromberg dated November 2, 2017 and the exhibits thereto, and upon the accompanying Memorandum of Law, Plaintiff/Movant Christopher Godson respectfully requests this Court for an Order (1) holding Respondent PKF O'Connor Davies, LLP in contempt of court for failing to obey a subpoena in the underlying case of *Godson v. Eltman, Eltman & Cooper, P.C., et al.* W.D.N.Y. 11-cv-764(EAW)(HKS); (2) requiring Respondent to comply with the subpoena; (3) directing Respondent to pay Mr. Godson's reasonable

attorney fees and costs for bringing these contempt proceedings, as well as his costs for the deposition Respondent failed to attend (\$344.31); and (4) such other relief which to the Court may seem just and proper.

Dated: New York, NY
November 2, 2017

/s/ Brian L. Bromberg
Brian L. Bromberg
Bromberg Law Office, P.C.
26 Broadway, 21st Fl.
New York, NY 10004
Tel: (212) 248-7906
Fax: (212) 248-7908
brian@bromberglawoffice.com

Attorneys for Plaintiff

Brian L. Bromberg
Bromberg Law Office, P.C.
26 Broadway, 21st Fl.
New York, NY 10004
Tel: (212) 248-7906
Fax: (212) 248-7908
Email: brian@bromberglawoffice.com

Kenneth R. Hiller
Seth J. Andrews
Law Offices of Kenneth Hiller, PLLC
6000 N. Bailey Avenue – Suite 1A
Amherst, New York 14226
Tel: (716) 564-3288
Email: khiller@kennethhiller.com

Jonathan R. Miller
Salem Community Law Office
301 N. Main St., Suite 2415
Winston-Salem, NC 27101
Tel: (336) 837-4437
Fax: (336) 837-4436
Email: jmiller@salemcommunitylaw.com